

*UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS*

MARGARET WAGNER,

Plaintiff,

vs.

BAYSTATE HEALTH, INC.,

Defendant.

CIVIL ACTION NO. 12-cv-30146-MAP

**ASSENTED TO EMERGENCY MOTION TO EXTEND  
SUMMARY JUDGMENT HEARING DATE**

NOW COMES, the Parties and respectfully move this Honorable Court to extend the Summary Judgment Hearing date to the week of September 23, 2013. Counsel for both Parties are available on September 25 after 10:00 a.m., afternoon of September 26, September 27, September 30, and the morning of October 1. The Summary Judgment Hearing is currently scheduled for September 16, 2013, at 9:30 a.m. Amelia J. Holstrom, counsel for the Defendant, had a death in the family and will be out of the office later this week and early next week. Additionally, Marylou Fabbo, lead counsel for the Defendant, recently learned that she will need to take a leave of absence for medical reasons and began that leave on August 26, 2013. Her current date of return is presently unknown.

WHEREFORE, the Parties respectfully request that the Court grant this Motion.

Assented To,

Respectfully submitted,

/s/ Tani E. Sapirstein

Tani E. Sapirstein, Esq.  
BBO No. 236850  
Sapirstein & Sapirstein, P.C.  
1350 Main Street, 12<sup>th</sup> Floor  
Springfield, MA 01103  
Tel. (413) 827-7500  
Fax: (413) 827-7797  
E-mail: tani@sandslaw.com

/s/ Amelia J. Holstrom

Amelia J. Holstrom, Esq.  
BBO No. 681710  
Marylou Fabbo, Esq.  
BBO No. 566613  
Counsel for Defendant  
Skoler, Abbott & Presser, P.C.  
One Monarch Place, Suite 2000  
Springfield, Massachusetts 01144  
Tel.: (413) 737-4753/ Fax: (413) 787-1941  
E-Mail: aholstrom@skoler-abbott.com  
E-Mail: mfabbo@skoler-abbott.com

Dated: September 11, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on September 11, 2013.

/s/ Amelia J. Holstrom  
Amelia J. Holstrom, Esq.